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Honorable Robert P. Patterson
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Room 2550
New York, New York 10007

MEMO ENDORSEL

Re: International Marine Underwriters v.
MV EASLINE TIANJIN, et. al. - 06 CV 13439

Indemnity Insurance Company of North America v.
C.U. Transport Inc., et. al. - 07 CV 959

Reed & Barton Corporation v. Unfriedt Forwarder
Inc. - 07 CV 1357

American Home Assurance Company v. MV
EASLINE TIANJIN, et. al. - 07 CV 2562

The Travelers et. al. V. MV EASLINE TIANJIN -
07 CV 3104

Klaussner International, LLC v. MV EASLINE
TIANJIN - 07 CV 3180

Our file 8923/PMK

Dear Judge Patterson:

We are pleased to advise that an agreement has been reached between the plaintiffs, third party plaintiffs, and defendant, Yang Ming, in the referenced actions. In order that there is no confusion, this settlement does not involve co-defendants Hyundai and Kawasaki Kisen Kaisha. In an order to finalize the settlement as far as the Yang

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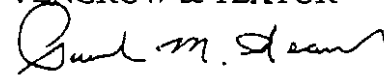
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Ming cases, we need to get all co-defendants involved in those cases on board with the terms of the settlement. Consequently, it is respectfully requested that the return date of our jurisdiction motion be adjourned two weeks during which time we will try to work out the terms of a stipulation of discontinuance with prejudice with all defendants involved in the Yang Ming cases. The reason we do not want to withdraw the motion is that if, for any reason, any co-defendant doesn't want to go along with the settlement, then they would have to respond to our jurisdiction motion.

Your assistance in this matter is appreciated.

Very truly yours,

CICHANOWICZ, CALLAN, KEANE,
VENGROW & TEXTOR



Paul M. Keane

PMK/am

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*Appellate court
the return date on
the motion is extended
to 10/16/07 at 1:30 PM
so ordered
Paul M. Keane
9/27/07*